



Bank Secrecy Act (BSA) E-Filing System

## **XML Batch Processing: FinCEN DOEP & Form 8300**

May 1, 2019

Good afternoon and welcome to today's BSA E-Filing System - XML Batch Processing - webinar. Overseeing this webinar is Ken Janoski, the BSA E-Filing System Program Director. The lead presenter will be Matt Gardner, the BSA E-Filing Program Manager. Please be advised that a copy of this webinar will be available for download on the BSA E-Filing web site by the end of the week.



## Before we begin...

- **Who is the target audience for this briefing?**
  - Batch filers, specifically:
    - FinCEN Form 110 – DOEP (*existing/prospective*)
    - Form 8300 (*prospective*)
- **What is covered in this briefing?**
  - Summary of the new XML batch functionality for the FinCEN DOEP and Form 8300
  - Technical overview of the new XML Schemas associated with the above forms

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Before we begin, let's first identify the target audience for this webinar and what we intend to cover:

- The target audience for this webinar is electronic batch filers, specifically:
  - Current DOEP batch filers or anyone who are interested in becoming a DOEP batch filer.
  - Form 8300 filers who are interested in batch filing as opposed to discrete filing.
- In this webinar we will provide a:
  - Summary of the new XML batch functionality for the FinCEN DOEP and Form 8300
  - Technical overview of the new XML schemas associated with these forms



## Agenda

- **Release Summary**
  - Key Dates
  - XML Batch Processing Impact
- **Documentation Overview**
  - XML Schema
  - XML User Guide
- **Batch Examples**
  - FinCEN DOEP
  - Form 8300
- **Q&A**

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We will be covering the following topics during this webinar:

- First we will discuss the key dates for this system change and what impact it will have on the filing community.
- Next we will provide an overview of the supporting XML schema and User Guide documentation
- We will then provide some XML batch file examples for both form types in this release,
- And finally, before we conclude the webinar, we will take questions from the participants using the webinar software interface. Participants can type in their questions and we will do our best to respond to as many as possible. If we are unable to get to your question during the webinar, please send it to the help desk and we will respond to you direct.

Ok, let's get started...



## Key Dates / Overview

- **Project Release**
  - **March 22, 2019:** Notice posted to the BSA E-Filing System regarding this release ([https://bsae filing.fincen.treas.gov/docs/BSAE-Filing\\_XML\\_Announcement\\_March2019\\_Final.pdf](https://bsae filing.fincen.treas.gov/docs/BSAE-Filing_XML_Announcement_March2019_Final.pdf))
  - **April 5, 2019:** XML batch processing for FinCEN DOEP and Form 8300 deployed to BSA E-Filing System Production and User Test (<https://sdtmut.fincen.treas.gov>) environments.
- **Legacy FinCEN DOEP (ASCII) Batch Retirement:**
  - **January 1, 2020:** BSA E-Filing will no longer accept FinCEN DOEP batch submissions in ASCII format. Filers must transition to XML format by this date to continue batch filing this form type.
- **What filers should expect...**
  - BSA E-Filing System updated to accept XML batch format for the FinCEN DOEP and Form 8300
  - BSA E-Filing System updated to provide XML batch validation feedback upon submission of the above form types.
  - BSA E-Filing System to return acknowledgements in XML format for the above form types.

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On March 22, 2019, FinCEN posted a notice to the BSA E-Filing System public page announcing the new XML batch functionality for the FinCEN DOEP and Form 8300. A link to that notice is displayed at the top of the slide.

Two weeks later, on April 5, FinCEN deployed the ability to file the FinCEN DOEP and Form 8300 in XML batch format. This was deployed on both the User Test and Production sites. A link to the User Test site is also displayed.

At this time, these forms are available for submission in XML batch format, which includes validation of the batch file format and content, as well as acknowledgement processing in XML format. NOTE that server-to-server batch filers also have the ability to file using the new XML format, which we will go over in more detail later in this briefing.

If you are an existing FinCEN DOEP batch filer --- in which case your batch files are in ASCII format --- FinCEN will continue to accept this format until January 1, 2020. This means that financial institutions will have until this date to fully transition to the new XML format if they wish to continue batch filing the FinCEN DOEP.

So to recap:

1. The BSA E-Filing System as been updated to accept the FinCEN DOEP and

Form 8300 in batch XML format. This is true for both the User Test and Production environments.

2. Upon submission of the new XML batch file, the system will provide validation feedback similar to the other XML form types, as well as batch acknowledgements in XML format.
3. The system will continue to accept the legacy ASCII batch format for the FinCEN DOEP until January 1, 2020, but XML batch format will only be accepted beyond this date.



## XML Schema & User Guide Overview

- **What is an XML Schema?**

- An XML schema describes the overall structure of an XML document, in this case, the batch FinCEN DOEP and batch Form 8300.
- An XML batch submission must pass XML schema validation; otherwise, it will NOT be accepted.

Access to the XML Schemas for the FinCEN DOEP and Form 8300 are posted below:

[https://www.fincen.gov/sites/default/files/schema/base/EFL\\_DOEPXBatchSchema.xsd](https://www.fincen.gov/sites/default/files/schema/base/EFL_DOEPXBatchSchema.xsd)

[https://www.fincen.gov/sites/default/files/schema/base/EFL\\_8300XBatchSchema.xsd](https://www.fincen.gov/sites/default/files/schema/base/EFL_8300XBatchSchema.xsd)

- **What is an XML User Guide?**

- The XML User Guide is a detailed electronic batch filing requirements document designed to be used in combination with the associated XML schema.
- The guide provides a complete definition of the XML batch file requirements, including detailed business and validation rules, corresponding acknowledgement file layout (separate XML schema located), and XML batch file examples.
- Included in the guide is a detailed description of each element that can be included in the XML batch file, for example: Element name and description; When and when not to record the element; What value(s) can be recorded for the element; How many iterations the element may be recorded; Conditions to avoid that will result in reporting errors.

Access to the XML User Guides for the FinCEN DOEP and Form 8300 are posted below:

[https://bsaeifiling.fincen.treas.gov/docs/XMLUserGuide\\_FinCENDOEP.pdf](https://bsaeifiling.fincen.treas.gov/docs/XMLUserGuide_FinCENDOEP.pdf)

[https://bsaeifiling.fincen.treas.gov/docs/XMLUserGuide\\_FinCEN8300.pdf](https://bsaeifiling.fincen.treas.gov/docs/XMLUserGuide_FinCEN8300.pdf)

Sample XML files are available for download here:

<https://bsaeifiling.fincen.treas.gov/docs/DOEP8300XMLSamples.zip>

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FinCEN has moved to the industry standard of XML for transfer and acceptance of batch filings, first with the FinCEN CTR, FBAR, and SAR, and now the FinCEN DOEP and 8300. XML format allows for additional data validation via an XML schema, a more flexible means for future updates and changes, and should make the level of effort needed for programming updates substantially lower as compared to the ASCII fixed-length format currently in use.

There are two important documents that you will help you prepare to batch file in XML format: The batch XML schema and XML user guide.

So, what is an XML schema? An XML schema describes the overall structure of an XML document, in this case, the batch FinCEN DOEP and batch Form 8300.

Simply put, an XML schema defines the layout of the batch file, ensuring that all elements are properly named, in the correct sequence, and contain appropriate values. Filers can use this schema to validate their batch files in any supported XML editing tool prior to electronic submission. If the batch file does not pass schema validation, the file cannot be processed by FinCEN and will not be accepted. A link to the XML schemas for the FinCEN DOEP and Form 8300 are posted at the top of the slide.

The XML User Guide, on the other hand, is a detailed electronic batch filing

requirements document designed to be used in combination with the associated XML schema.

Simply put, it is the equivalent to the Electronic Filing Requirements for the ASCII batch format. It includes business and validation rules to support the electronic batch submission of the data in XML format, as well as a detailed description of each element that may be recorded. It outlines both the incoming batch file and outgoing acknowledgement file format, with detailed examples for each.

Later in this deck we will breakdown how each element is defined in the user guide, but from a high level perspective, each element definition will include the:

- Element name and description
- When and when not to record the element
- What value(s) can be recorded for the element
- How many iterations the element may be recorded
- Conditions to avoid that will result in reporting errors

A link to the XML User Guide for the FinCEN DOEP and Form 8300 are posted at the bottom of the slide.



# XML Schema: Overview

The following snippet is the collapsed version of the FinCEN DOEP XML schema. It contains three general sections: redefine, batch, and validation (see below for details): (NOTE: This format is applicable to the Form 8300 XML schema as well.)

- ❖ **Redefine:** Defines each complexType element and associated sub-elements that may be included in the FinCEN DOEP batch file. It includes info such as the name and order of each sub-element, the type validation applied to the element, and the number of occurrences allowed for the sub-element.
- ❖ **Batch:** Defines the order and occurrence of elements in the batch file while leveraging the types and sub-elements defined in the redefine section above.
- ❖ **Validation:** Defines how the value associated with the element is validated, such as pattern restrictions, maxLength, enumeration, etc.

```
1 <?xml version="1.0" encoding="UTF-8"?>
2 <!-- edited with XMLSpy v2018 (http://www.altova.com) by FinCEN (Department of the Treasury) -->
3 <!-- current version v1.0 -->
4 <!-- revision history -->
5 <!-- 03/14/2019 (v1.0) -->
6 <xsd:schema xmlns="http://www.fincen.gov/base" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
7   xmlns:vc="http://www.w3.org/2007/XMLSchema-versioning" xmlns:fc2="http://www.fincen.gov/base"
8   xmlns:xi="http://www.w3.org/2001/XMLSchema-instance" targetNamespace="http://www.fincen.gov/batch"
9   attributeFormDefault="unqualified" xsi:schemaLocation="http://www.fincen.gov/sites/default/files/schema/base/BSA_800_2.0.xsd"
10  >
11   <!---Redefine START-->
12   <xsd:redefine schemaLocation="https://www.fincen.gov/sites/default/files/schema/base/BSA_800_2.0.xsd"
13     baseSchema="http://www.fincen.gov/sites/default/files/schema/base/BSA_800_2.0.xsd"
14     >
15     <!---Batch START-->
16     <xsd:element name="FilingBatchXML" type="FilingBatchXML" minOccurs="1" maxOccurs="1"/>
17     <xsd:element name="Activity" type="Activity" minOccurs="1" maxOccurs="1"/>
18     <xsd:element name="Party" type="Party" minOccurs="1" maxOccurs="1"/>
19     <!---Batch END-->
20     <!---Validation START-->
21     <xsd:simpleType name="DateYYYYMMDDType" base="xsd:string" totalDigits="10" pattern="([0-9]{4})([0-9]{2})([0-9]{2})"/>
22     <xsd:simpleType name="RestrictString" base="xsd:string" totalDigits="255" pattern="([a-zA-Z0-9]{1,255})"/>
23     <xsd:simpleType name="RestrictString16" base="xsd:string" totalDigits="16" pattern="([a-zA-Z0-9]{1,16})"/>
24     <xsd:simpleType name="RestrictString35" base="xsd:string" totalDigits="35" pattern="([a-zA-Z0-9]{1,35})"/>
25     <xsd:simpleType name="RestrictString100" base="xsd:string" totalDigits="100" pattern="([a-zA-Z0-9]{1,100})"/>
26     <xsd:simpleType name="RestrictString150" base="xsd:string" totalDigits="150" pattern="([a-zA-Z0-9]{1,150})"/>
27     <xsd:simpleType name="RestrictString255" base="xsd:string" totalDigits="255" pattern="([a-zA-Z0-9]{1,255})"/>
28     <xsd:simpleType name="RestrictString30" base="xsd:string" totalDigits="30" pattern="([a-zA-Z0-9]{1,30})"/>
29     <xsd:simpleType name="RestrictString35" base="xsd:string" totalDigits="35" pattern="([a-zA-Z0-9]{1,35})"/>
30     <xsd:simpleType name="RestrictString100" base="xsd:string" totalDigits="100" pattern="([a-zA-Z0-9]{1,100})"/>
31     <xsd:simpleType name="RestrictString150" base="xsd:string" totalDigits="150" pattern="([a-zA-Z0-9]{1,150})"/>
32     <xsd:simpleType name="RestrictString255" base="xsd:string" totalDigits="255" pattern="([a-zA-Z0-9]{1,255})"/>
33     <xsd:simpleType name="ValidateActivityPartyCodeType" base="xsd:string" totalDigits="10" pattern="([a-zA-Z0-9]{1,10})"/>
34     <xsd:simpleType name="ValidateFederalRegulatorCodeType" base="xsd:string" totalDigits="10" pattern="([a-zA-Z0-9]{1,10})"/>
35     <xsd:simpleType name="ValidateIndicatorType" base="xsd:string" totalDigits="10" pattern="([a-zA-Z0-9]{1,10})"/>
36     <xsd:simpleType name="ValidatePartyIdentificationCodeType" base="xsd:string" totalDigits="10" pattern="([a-zA-Z0-9]{1,10})"/>
37     <xsd:simpleType name="ValidatePartyNameCodeType" base="xsd:string" totalDigits="10" pattern="([a-zA-Z0-9]{1,10})"/>
38     <!---Validation END-->
39   </xsd:redefine>
40 </xsd:schema>
```

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Here we highlight the overall layout of the XML schema. The example provided is from the FinCEN DOEP XML schema, but is the same general layout as the Form 8300.

The schema is broken up into three general sections:

- Redefine
- Batch
- Validation

First let's briefly discuss the Redefine section. This section takes complexType elements from a master schema (internal to FinCEN, which lists every possible element for all form types) and filters out which elements are applicable to the specific form type, in this case the FinCEN DOEP.

The next section is the Batch section. This section defines how the batch file must be structured in terms of the element order, the element type, and the number of acceptable occurrences for each element.



The final section is the Validation section. This section defines how each element will be validated in terms of the value recorded. For example, some validations limit the max length of a values that can be recorded, so if more than that number of characters is recorded for the element, it will fail schema validation.

On the next slide we will break down the schema further.



## XML Schema: Example

In the following example, we see the element **Party**, which is an extension of **PartyType**:

- ❖ Elements defined for **PartyType** (e.g. **ActivityPartyTypeCode**, **PartyAsEntityOrganizationIndicator**, etc.) must be recorded prior to the elements defined for **Party** (e.g. **PartyName**, **Address**, etc.)

```
<xsd:complexType name="PartyType">
  <xsd:complexContent>
    <xsd:restriction base="PartyType">
      <xsd:sequence>
        <xsd:element name="ActivityPartyTypeCode" type="ValidateActivityPartyCodeType"/>
        <xsd:element name="PartyAsEntityOrganizationIndicator" type="ValidateIndicatorType"/>
        <xsd:element name="PrimaryRegulatorTypeCode" type="ValidateFederalRegulatorCodeType"/>
      </xsd:sequence>
      <xsd:attribute name="SeqNum" type="xsd:long"/>
    </xsd:restriction>
  </xsd:complexContent>
</xsd:complexType>

<xsd:element name="Party">
  <xsd:complexType>
    <xsd:complexContent>
      <xsd:extension base="PartyType">
        <xsd:sequence>
          <xsd:element name="PartyName" type="PartyNameType" minOccurs="0"/>
          <xsd:element name="Address" type="AddressType" minOccurs="0"/>
          <xsd:element name="PhoneNumber" type="PhoneNumberType" minOccurs="0"/>
        </xsd:sequence>
      </xsd:extension>
    </xsd:complexContent>
  </xsd:complexType>
</xsd:element>
```

- ❖ Each **PartyType** sub-element is associated with a type restriction, for example, **ValidateIndicatorType**. This validation restricts the value for the element to only accept a "Y" value or null (i.e. no value).

```
348 <xsd:simpleType name="ValidateIndicatorType">
349   <xsd:restriction base="xsd:string">
350     <xsd:enumeration value="Y"/>
351     <xsd:enumeration value=""/>
352   </xsd:restriction>
</xsd:simpleType>
```

- ❖ Sample output XML batch file for **Party** based on the above:

```
<fc2:Party SeqNum="34">
  <fc2:ActivityPartyTypeCode>11</fc2:ActivityPartyTypeCode>
  <fc2:PartyAsEntityOrganizationIndicator>Y</fc2:PartyAsEntityOrganizationIndicator>
  <fc2:PartyName SeqNum="44">
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawEntityIndividualLastName>Name of business</fc2:RawEntityIndividualLastName>
  </fc2:PartyName>
  <fc2:Address SeqNum="45">
```

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Here we highlight the **Party** element in the XML schema. The **Party** element represents any individual or entity associated with the form. It is an extension of **PartyType**, which is listed in the redefine section of the schema.

In the first bullet, we see that there are three sub-elements that may be recorded before any other sub-element for the **Party** element (they are **ActivityPartyTypeCode**, **PartyAsEntityOrganizationIndicator**, and **PrimaryRegulatorTypeCode**). Now, depending on what type of **Party** you are recording will determine which of these elements should be included for the **Party** (this is further defined in the User Guide). Then, following the redefined sub-elements, the sub-elements **PartyName**, **Address**, and **PhoneNumber** may then be recorded (based on the second image for this first bullet section).

The second bullet provides an example of the validation associated with the **PartyType** sub-element. In this example, the indicator element that identifies the **Party** as an Entity. For this element, the type is **ValidateIndicatorType**, which only allows a Y to indicate yes, or an empty value (i.e. null) to indicate No. If any other value is recorded for this element, it will fail schema validation. It's worth noting that in most cases an element need not be recorded unless there is a value associated with them, which is explained in more detail in the User Guide.

The third bullet is a sample output of the Party element associated with the Exempt person, which is indicated by the value of “11” for the ActivityPartyTypeCode. As you can see, the sub-elements noted in the first bullet are recorded prior to the PartyName and Address elements. And since the Exempt person does not have a primary regulator field associated with it, the PrimaryRegulatorTypeCode element is NOT recorded for this party type.

We will now shift our focus to the XML User Guide on the next few slides.



## XML User Guide: Overview

The XML User Guide is comprised of 10 high-level sections. The table below describes sections 1-4:

#	Summary	Description
1	Introduction	<ul style="list-style-type: none"><li>Brief introduction and form identification.</li></ul>
2	Schema Overview	<ul style="list-style-type: none"><li>High-level overview of the batch schema and general file organization.</li><li>Primary element structure breakdown, describing the XML declaration, EFilingBatchXML (root) element, and the general contents of each Activity element in the batch file (the Activity element represents each report included in the batch).</li><li>Breakdown of the various Party element types to be recorded for each Activity element in the batch file (the Party element represents either any individual or entity/organization associated with the report).</li></ul>
3	Batch Reporting Requirements	<ul style="list-style-type: none"><li>Element definition overview describing the terms by which each element is defined in the guide.</li><li>Batch validation overview providing core batch file formatting requirements that should be applied universally when creating the XML batch file.</li></ul>
4	Element Requirements	<ul style="list-style-type: none"><li>Detailed definition of each element in the XML batch file. Elements are recorded in the order by which they should be recorded in the XML batch file.</li><li>Element definition of each element, including:<ul style="list-style-type: none"><li>Element name   minOccurs   maxOccurs</li><li>Description of the element with references to the corresponding item(s) on the form and/or any sub-elements when applicable</li><li>Attributes to be recorded with the element (if any)</li><li>Parent element association</li><li>Element Restrictions (i.e. when and when not to record the element)</li><li>Value Restrictions (i.e. what value(s) may be recorded for the element)</li><li>Remarks (i.e. which scenarios will result in batch rejections and/or acceptance with warning errors)</li><li>Example (i.e. brief XML example of the element)</li></ul></li></ul>

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The XML User Guide is comprised on 10 high-level sections, which is the same for both the FinCEN DOEP and Form 8300 User Guides. The table below describes sections 1-4. They are:

1. Introduction – This section identifies the form type associated with the User Guide.
2. Schema Overview – This section provides a high-level overview of the batch file, along with the primary element structure breakdown, such as the EFilingBatchXML (root) element, the general contents of each Activity element in the batch file, which represents each report included in the batch), and the various Party element types to be recorded for each Activity element in the batch file (as a reminder, the Party element represents either any individual or entity associated with the report).
3. Batch Reporting Requirements – This section provides general element definition overview and core batch file formatting requirements that should be applied throughout the batch, such as each element must begin with the prefix “fc2” and there should be no whitespace characters (leading and trailing spaces” in the batch file.
4. Element Requirements – This section is the bulk of the User Guide. It provides a detailed definition of each element in the batch file. Each element

in the User Guide is recorded in the same order that it should be recorded in the actual batch file. Each element definition includes the sub-bullets listed here, such as the name of the element, how many occurrences are acceptable as defined by the min and max occurs value, etc. Everything you need to know about each element is documented in the elements definition in the User Guide.



## XML User Guide: Overview (cont.)

The XML User Guide is comprised on 10 high-level sections. The table below describes sections 5-10:

#	Summary	Description
5	Party Elements by Party Type	<ul style="list-style-type: none"><li>• Element associated by Party type. Includes bubble chart describing which Party elements may be associated with each Party type in the batch file. For example, the PhoneNumer element may only be recorded for the batch Transmitter and Contact for Assistance person for each Activity in a FinCEN DOEP XML batch file.</li><li>• XML example for each Party type in the batch file.</li></ul>
6	Acknowledgement Format	<ul style="list-style-type: none"><li>• Detailed breakdown of the corresponding XML acknowledgement file that is returned for each accepted batch submission. Includes XML file structure, element definitions, and an XML example of a complete batch acknowledgement file.</li></ul>
7	Error Descriptions	<ul style="list-style-type: none"><li>• All possible errors that may be triggered for an XML batch submission, including the error code, text description, severity (fatal or warning), associated element(s), and form reference (i.e. the corresponding item(s) on the form the error is associated with).</li><li>• If any fatal errors are produced for your batch submission, the entire batch will be rejected. If only warning errors are produced, the batch will be accepted but additional corrective action may be necessary depending on the warning(s) produced.</li></ul>
8	Error Correction Instructions	<ul style="list-style-type: none"><li>• Description of various error categories and how to respond when errors are encountered.</li></ul>
9	Electronic XML Filing Instructions	<ul style="list-style-type: none"><li>• Filing instructions with an emphasis on business requirements associated with the specific form type being filed.</li><li>• General instructions such as who must file, where and when to file, etc.</li><li>• Item Instructions detailing each Item on the form.</li></ul>
10	Secure Data Transfer Mode Instructions	<ul style="list-style-type: none"><li>• High-level instructions for filing the XML batch file via secure server-to-server data transfer.</li></ul> <p>NOTE: If filers are interested in this method of batch transmission, please contact the help desk for assistance.</p>

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This slide is a continuation of the previous one. It includes sections 5-10 of the User Guide:

5. Party Element by Party Type – This section provide a table that lists all possible Party sub-elements for each party type on the form. For example, a list of all elements associated with the Exempt person, the Bank filing the exemption, the Affiliated bank (if any), etc. It also provides XML examples of each Party type.
6. Acknowledgement Format – This section provides a breakdown of the XML acknowledgement file that is returned for each accepted XML batch submission.
7. Error Descriptions – This section provides all validation errors, either fatal or warning, associated with the batch.
8. Error Correction Instructions – This section provides information regarding how to respond to errors in the batch, such as whether or not to file an amendment.
9. Electronic XML Filing Instructions – This section provided detailed policy requirements and business rules that should be followed by the filer for the form type.
10. Secure Data Transfer Mode Instructions – This section provides a brief

overview of the requirements for filing batch data via secure server-to-server transmission rather than manual upload via the web browser. If you are interested in this method of submission, please reach out to the help desk for consultation.



# FincEN DOEP XML Batch: Sample

```
<?xml version="1.0" encoding="UTF-8"?>
<fc2:EPFilingBatchXML ActivityCount="4" PartyCount="14"
xmlns:cst="http://www.w3.org/2001/XMLSchema-Instance" xmlns:fc2="www.fincen.gov/base"
xmlns:schemaLocation="www.fincen.gov/base
https://www.fincen.gov/sites/default/files/schema/base/EPF_DOEPBatchSchema.xsd">
  <fc2:ForeTypeCode>DOEP</fc2:ForeTypeCode>
  <fc2:Activity SeqNum="1"></fc2:Activity>
  <fc2:Activity SeqNum="2"></fc2:Activity>
  <fc2:Activity SeqNum="3"></fc2:Activity>
  <fc2:Activity SeqNum="4"></fc2:Activity>
</fc2:EPFilingBatchXML>
```

Here is a collapsed example of a DOEP XML batch file. It contains four unique DOEP reports, represented by the **Activity** element. Each **Activity** contains the **SeqNum** attribute, which includes a numeric value that is unique within the batch file.

Here is the same example with each Activity element expanded to display the various sub-elements further defined below:

- **DesignatedMoreThanOneBankIndicator** – If the DOEP includes one or more affiliated banks, this element is recorded with a Y value.
- **EPFilingPriorDocumentNumber** – If the DOEP is an amendment, the prior report BSA ID is recorded here.
- **FilingDateText** – Date on which the report is filed.
- **ActivityAssociation** – This element indicates if this report is an initial designation, amendment, or revocation.
- **Various Party elements representing the:**
  - Transmitter (1)
  - Transmitter Contact (1)
  - Exempt person (1)
  - Filer Bank (1)
  - Affiliated Bank (up to 99)
  - Authorized official (1)
- **DesignationExemptActivity** – This element indicates type of exempt person and when the exemption takes effect.

```
<fc2:Activity SeqNum="1">
  <fc2:FilingDateText>20190213</fc2:FilingDateText>
  <fc2:ActivityAssociation SeqNum="77"></fc2:ActivityAssociation>
  <fc2:Party SeqNum="8"></fc2:Party>
  <fc2:Party SeqNum="9"></fc2:Party>
  <fc2:Party SeqNum="10"></fc2:Party>
  <fc2:Party SeqNum="11"></fc2:Party>
  <fc2:Party SeqNum="12"></fc2:Party>
  <fc2:DesignationExemptActivity SeqNum="13"></fc2:DesignationExemptActivity>
</fc2:Activity>
<fc2:Activity SeqNum="2">
  <fc2:EPFilingPriorDocumentNumber>31000000001234</fc2:EPFilingPriorDocumentNumber>
  <fc2:FilingDateText>20190213</fc2:FilingDateText>
  <fc2:ActivityAssociation SeqNum="31"></fc2:ActivityAssociation>
  <fc2:Party SeqNum="32"></fc2:Party>
  <fc2:Party SeqNum="33"></fc2:Party>
  <fc2:Party SeqNum="34"></fc2:Party>
  <fc2:Party SeqNum="35"></fc2:Party>
  <fc2:Party SeqNum="36"></fc2:Party>
  <fc2:DesignationExemptActivity SeqNum="37"></fc2:DesignationExemptActivity>
</fc2:Activity>
<fc2:Activity SeqNum="3">
  <fc2:FilingDateText>20190213</fc2:FilingDateText>
  <fc2:ActivityAssociation SeqNum="54"></fc2:ActivityAssociation>
  <fc2:Party SeqNum="55"></fc2:Party>
  <fc2:Party SeqNum="56"></fc2:Party>
  <fc2:Party SeqNum="57"></fc2:Party>
  <fc2:Party SeqNum="58"></fc2:Party>
  <fc2:Party SeqNum="59"></fc2:Party>
  <fc2:DesignationExemptActivity SeqNum="60"></fc2:DesignationExemptActivity>
</fc2:Activity>
<fc2:Activity SeqNum="4">
  <fc2:DesignatedMoreThanOneBankIndicator>Y</fc2:DesignatedMoreThanOneBankIndicator>
  <fc2:EPFilingPriorDocumentNumber>31000000005678</fc2:EPFilingPriorDocumentNumber>
  <fc2:FilingDateText>20190213</fc2:FilingDateText>
  <fc2:ActivityAssociation SeqNum="79"></fc2:ActivityAssociation>
  <fc2:Party SeqNum="80"></fc2:Party>
  <fc2:Party SeqNum="81"></fc2:Party>
  <fc2:Party SeqNum="82"></fc2:Party>
  <fc2:Party SeqNum="83"></fc2:Party>
  <fc2:Party SeqNum="84"></fc2:Party>
  <fc2:Party SeqNum="85"></fc2:Party>
  <fc2:Party SeqNum="86"></fc2:Party>
  <fc2:DesignationExemptActivity SeqNum="87"></fc2:DesignationExemptActivity>
</fc2:Activity>
```

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(No notes for this slide)





- ActivityAssociation includes the ExemptionAmendedIndicator element, indicating that the DOE# is an amendment.
- The 1<sup>st</sup> Party element recorded identifies the Transmitter information (as indicated by value 35 for the ActivityPartyTypeCode), and includes the name, address, phone, EIN, and TCC code.
- The 2<sup>nd</sup> Party element recorded identifies the Transmitter Contact person information (as indicated by value 37 for the ActivityPartyTypeCode), and only the name should be included.
- The 3<sup>rd</sup> Party element recorded identifies the Exempt person information (as indicated by value 11 for the ActivityPartyTypeCode), and includes the entity indicator, name, address, phone, EIN or SSN, occupation or business, and email address.
- The 4<sup>th</sup> Party element recorded identifies the Filer Bank information (as indicated by value 45 for the ActivityPartyTypeCode), and includes the primary regulator type, name, address, EIN, and RSSD.
- The 5<sup>th</sup> and 6<sup>th</sup> Party elements recorded identifies the Affiliated Bank information (as indicated by value 12 for the ActivityPartyTypeCode), and includes the primary regulator type, name, address, EIN, and RSSD. In this example, there are two affiliated banks, but some may not have any and this party type would not be recorded for the Activity. No more than 99 may be recorded for each Activity.
- DesignationExemptActivity includes the ExemptBasisTypeCode "D" which indicates that the exempt person is a listed company subsidiary. It also includes the ExemptEffectiveBeginDateText element, which includes the date upon which the exemption takes effect.

```

(1) cfi:ActivitySection="4";
(2) cfi:DocumentIndicator="v"; cfi:DesignatedPrimaryDocumentIndicator="v";
(3) cfi:FillerInRoleDocumentNumber="31000000005678"; cfi:FillerInRoleDocumentNumberIndicator="v";
(4) cfi:FillerInRoleText="20190101"; cfi:FillerInRoleTextIndicator="v";
(5) cfi:ActivityAssociation="v"; cfi:ActivityAssociationIndicator="v";
(6) cfi:ExemptionEndedIndicator="v"; cfi:ExemptionEndedIndicator="v";
(7) cfi:ActivityAssociation="v";
(8) cfi:PartySection="50";
(9) cfi:ActivityPartyTypeCode="35"; cfi:ActivityPartyTypeCodeIndicator="v";
(10) cfi:PartyName="98"; cfi:PartyNameIndicator="v";
(11) cfi:Address="89"; cfi:AddressIndicator="v";
(12) cfi:PhoneNumber="90"; cfi:PhoneNumberIndicator="v";
(13) cfi:PartyIdentification="91"; cfi:PartyIdentificationIndicator="v";
(14) cfi:PartyIdentification="92"; cfi:PartyIdentificationIndicator="v";
(15) cfi:PartySection="51";
(16) cfi:ActivityPartyTypeCode="37"; cfi:ActivityPartyTypeCodeIndicator="v";
(17) cfi:PartyName="93"; cfi:PartyNameIndicator="v";
(18) cfi:PartySection="52";
(19) cfi:ActivityPartyTypeCode="11"; cfi:ActivityPartyTypeCodeIndicator="v";
(20) cfi:PartyIdentificationOrganizationIndicator="v"; cfi:PartyIdentificationOrganizationIndicator="v";
(21) cfi:PartyName="94"; cfi:PartyNameIndicator="v";
(22) cfi:Address="95"; cfi:AddressIndicator="v";
(23) cfi:PhoneNumber="96"; cfi:PhoneNumberIndicator="v";
(24) cfi:PartyIdentification="97"; cfi:PartyIdentificationIndicator="v";
(25) cfi:PartyOccupationBusiness="98"; cfi:PartyOccupationBusinessIndicator="v";
(26) cfi:ElectronAddress="99"; cfi:ElectronAddressIndicator="v";
(27) cfi:PartySection="53";
(28) cfi:ActivityPartyTypeCode="45"; cfi:ActivityPartyTypeCodeIndicator="v";
(29) cfi:PrimaryRegulatorTypeCode="26"; cfi:PrimaryRegulatorTypeCodeIndicator="v";
(30) cfi:PartyName="100"; cfi:PartyNameIndicator="v";
(31) cfi:PartyIdentification="101"; cfi:PartyIdentificationIndicator="v";
(32) cfi:PartyIdentification="102"; cfi:PartyIdentificationIndicator="v";
(33) cfi:PartyIdentification="103"; cfi:PartyIdentificationIndicator="v";
(34) cfi:PartySection="54";
(35) cfi:ActivityPartyTypeCode="12"; cfi:ActivityPartyTypeCodeIndicator="v";
(36) cfi:PrimaryRegulatorTypeCode="26"; cfi:PrimaryRegulatorTypeCodeIndicator="v";
(37) cfi:PartyName="104"; cfi:PartyNameIndicator="v";
(38) cfi:Address="105"; cfi:AddressIndicator="v";
(39) cfi:PartyIdentification="106"; cfi:PartyIdentificationIndicator="v";
(40) cfi:PartyIdentification="107"; cfi:PartyIdentificationIndicator="v";
(41) cfi:PartySection="55";
(42) cfi:ActivityPartyTypeCode="12"; cfi:ActivityPartyTypeCodeIndicator="v";
(43) cfi:PrimaryRegulatorTypeCode="26"; cfi:PrimaryRegulatorTypeCodeIndicator="v";
(44) cfi:PartyName="108"; cfi:PartyNameIndicator="v";
(45) cfi:Address="109"; cfi:AddressIndicator="v";
(46) cfi:PartyIdentification="110"; cfi:PartyIdentificationIndicator="v";
(47) cfi:PartyIdentification="111"; cfi:PartyIdentificationIndicator="v";
(48) cfi:PartySection="56";
(49) cfi:ActivityPartyTypeCode="35"; cfi:ActivityPartyTypeCodeIndicator="v";
(50) cfi:PartyName="112"; cfi:PartyNameIndicator="v";
(51) cfi:PhoneNumber="113"; cfi:PhoneNumberIndicator="v";
(52) cfi:PartySection="57";
(53) cfi:DesignationInceptivitySection="87";
(54) cfi:ExemptInceptivityRegulateIndicator="v"; cfi:ExemptInceptivityRegulateIndicator="v";
(55) cfi:ExemptInceptivityRegulateIndicator="20190106"; cfi:ExemptInceptivityRegulateIndicator="v";
(56) cfi:DesignationInceptivitySection="87";
(57) cfi:DesignationInceptivitySection="87";

```

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(No notes for this slide)



- Activity/Association includes the Initial/ReportIndicator element, indicating that the 8300 is a new filing.
- The 1<sup>st</sup> and 2<sup>nd</sup> Party elements recorded identifies the Transmitter and Transmitter Contact Information identical to the FinCEN DODP.
- The 3<sup>rd</sup> Party element recorded identifies the Individual from whom the cash was received (as indicated by value 16 for the Activity/PartyTypeCode), and includes the date of birth, name, address, SSN and/or EIN, form of ID, and occupation.
- The 4<sup>th</sup> Party element recorded identifies the Person on whose behalf the transaction was conducted (as indicated by value 23 for the Activity/PartyTypeCode), and includes the party type indicator, name, address, phone, EIN and/or SSN, form of ID, and occupation.
- The 5<sup>th</sup> Party element recorded identifies Business that received cash (as indicated by value 4 for the Activity/PartyTypeCode), and includes the name, address, EIN, and nature of the business.
- The 5<sup>th</sup> and 6<sup>th</sup> Party elements recorded identifies the Authorized Official (as indicated by value 3 for the Activity/PartyTypeCode) and the Contact for Assistance (as indicated by the value 8 for the Activity/PartyTypeCode). The name and phone is recorded for each respectively.
- Currency/Transaction/Activity is recorded to identify information found in Part III of the form, such as the type of transaction, total amount, date of transaction, etc.
- Activity/Narrative/Information is recorded when the 8300 form contains a comment or clarifying information based on any entry in the form. This element would not be recorded if no comment is recorded.

```

<fcgi:activitySequence="4">
  <fcgi:fillPageHeader>30192026</fcgi:fillPageHeader>
  <fcgi:SuspiciousTransactionIndicator>0</fcgi:SuspiciousTransactionIndicator>
  <fcgi:ActivityClassification>Seqnum="111"></fcgi:ActivityClassification>
  <fcgi:InitialReportIndicator>0</fcgi:InitialReportIndicator>
  <fcgi:ActivityAssociation>
    <fcgi:Party Seqnum="112"></fcgi:Party>
    <fcgi:Party Seqnum="113"></fcgi:Party>
    <fcgi:Party Seqnum="114"></fcgi:Party>
    <fcgi:ActivityPartyTypeCode>18</fcgi:ActivityPartyTypeCode>
    <fcgi:IndividualIdBirthdate>19920920</fcgi:IndividualIdBirthdate>
    <fcgi:PartyName Seqnum="117"></fcgi:PartyName>
    <fcgi:Address Seqnum="128"></fcgi:Address>
    <fcgi:PartyIdentification Seqnum="138"></fcgi:PartyIdentification>
    <fcgi:PartyOccupation Seqnum="139"></fcgi:PartyOccupation>
    <fcgi:PartyOccupation Seqnum="139"></fcgi:PartyOccupation>
    <fcgi:PartyOccupation Seqnum="139"></fcgi:PartyOccupation>
  </fcgi:ActivityAssociation>
  <fcgi:Party Seqnum="119">
    <fcgi:ActivityPartyTypeCode>23</fcgi:ActivityPartyTypeCode>
    <fcgi:Party Seqnum="120"></fcgi:PartyTypeCode>
    <fcgi:PartyName Seqnum="131"></fcgi:PartyName>
    <fcgi:Address Seqnum="133"></fcgi:Address>
    <fcgi:PartyIdentification Seqnum="134"></fcgi:PartyIdentification>
    <fcgi:PartyIdentification Seqnum="139"></fcgi:PartyIdentification>
    <fcgi:PartyOccupation Seqnum="139"></fcgi:PartyOccupation>
  </fcgi:Party>
  <fcgi:Party Seqnum="119">
    <fcgi:ActivityPartyTypeCode>48</fcgi:ActivityPartyTypeCode>
    <fcgi:PartyName Seqnum="137"></fcgi:PartyName>
    <fcgi:Address Seqnum="138"></fcgi:Address>
    <fcgi:PartyIdentification Seqnum="140"></fcgi:PartyIdentification>
    <fcgi:PartyOccupation Seqnum="140"></fcgi:PartyOccupation>
  </fcgi:Party>
  <fcgi:Party Seqnum="119">
    <fcgi:ActivityPartyTypeCode>3</fcgi:ActivityPartyTypeCode>
    <fcgi:PartyName Seqnum="141"></fcgi:PartyName>
  </fcgi:Party>
  <fcgi:Party Seqnum="119">
    <fcgi:ActivityPartyTypeCode>8</fcgi:ActivityPartyTypeCode>
    <fcgi:PartyName Seqnum="142"></fcgi:PartyName>
    <fcgi:PartyNumber Seqnum="143"></fcgi:PartyNumber>
  </fcgi:Party>
  <fcgi:CurrencyTransactionSeqnum>Seqnum="119">
    <fcgi:InitialPaymentOtherIndicator>0</fcgi:InitialPaymentOtherIndicator>
    <fcgi:TotalCashInflow>Amount=195000</fcgi:TotalCashInflow>AmountText=
    <fcgi:TotalPrincipleAmount=195000</fcgi:TotalPrincipleAmount>
    <fcgi:TransactionDate>20190206</fcgi:TransactionDate>
    <fcgi:CurrencyTransactionDetail Seqnum="144">
      <fcgi:DetailTransactionDescriptionPurchased 2014 Prius on installments 5/4/2012 at $506/month
        beginning June 2012</fcgi:DetailTransactionDescriptionPurchased 2014 Prius on installments 5/4/2012 at $506/month>
    </fcgi:CurrencyTransactionDetail>
    <fcgi:ActivityNarrativeInformation Seqnum="120">
      <fcgi:ActivityNarrativeSequenceNumber>1</fcgi:ActivityNarrativeSequenceNumber>
      <fcgi:ActivityNarrativeText>a description of why the source of the funds is
        suspicious</fcgi:ActivityNarrativeText>
    </fcgi:ActivityNarrativeInformation>
  </fcgi:Activity>

```

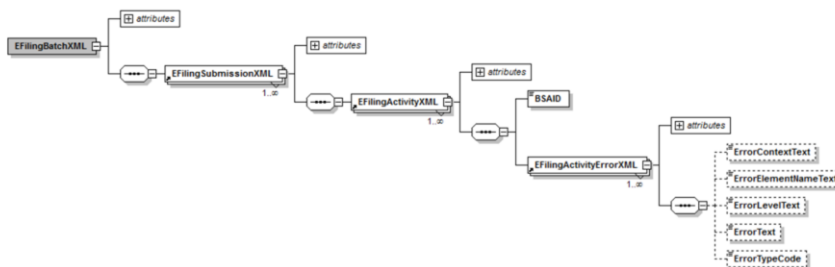
(No notes for this slide)



## XML Acknowledgement: Overview

- **XML Acknowledgement Processing**

- The FinCEN BSA Acknowledgement schema is used by all XML form types currently available on the BSA E-Filing System. To access this schema, click on the following link: [https://www.fincen.gov/sites/default/files/schema/base/EFL\\_BatchAcknowledgementSchema.xsd](https://www.fincen.gov/sites/default/files/schema/base/EFL_BatchAcknowledgementSchema.xsd)
- The following diagram provides an overview of the XML acknowledgment file structure, beginning with the EFileBatchXML element:



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As mentioned previously, each accepted batch file will receive a corresponding acknowledgement file in XML format. There is a separate schema that defines the acknowledgement file format, as well as a section in the User Guide that provides extensive details about this file and what you can expect. Basically, the purpose of this file is to return the BSA ID's assigned to each Activity in your batch submission, along with any validation errors triggered at the time of submission. If your file is rejected for any reason, you will NOT receive an acknowledgement file. This file is returned for Accepted batch files only, with or without errors, and is returned generally within 2 business days after submission acceptance. The acknowledgement file includes the SeqNum value for each Activity in your original batch file so that you can match the BSA IDs to the corresponding report in your original batch file. This is explained in detail in the User Guide.



## XML Acknowledgement: Sample

The sample below consists of three (3) FinCEN DOEP activities based on the original FinCEN DOEP batch submission:

- Each FinCEN DOEP from the original batch submission is associated with a <EFileActivityXML> element
- Each FinCEN DOEP receives a unique BSA Identifier (BSA ID)
- BSA ID 31000055053784 contains two errors (P02 & B08)
- BSA ID 31000055053785 contains no errors
- BSA ID 31000055053786 contains no errors

```
<?xml version="1.0" encoding="UTF-8"?>
<EFileBatchXML xmlns="www.fincen.gov/base" SeqNum="1" StatusCode="A">
  <EFileSubmissionXML SeqNum="1" StatusCode="A">
    <EFileActivityXML SeqNum="1">
      <BSAID>31000055053784</BSAID>
      <EFileActivityErrorXML SeqNum="1">
        <ErrorContextText>EFileBatchXML/Activity[1]/Party[25]/PartyName[30]/RawIndividualFirstName</ErrorContextText>
        <ErrorElementNameText>RawIndividualFirstName</ErrorElementNameText>
        <ErrorLevelText>WARN</ErrorLevelText>
        <ErrorText>The exempt person is an individual and first name is not provided.</ErrorText>
        <ErrorTypeCode>P02</ErrorTypeCode>
      </EFileActivityErrorXML>
      <EFileActivityErrorXML SeqNum="2">
        <ErrorContextText>EFileBatchXML/Activity[1]/Party[70]/Address[84]/RawZIPCode</ErrorContextText>
        <ErrorElementNameText>RawIndividualFirstName</ErrorElementNameText>
        <ErrorLevelText>WARN</ErrorLevelText>
        <ErrorText>The ZIP Code of the bank is not provided.</ErrorText>
        <ErrorTypeCode>B08</ErrorTypeCode>
      </EFileActivityErrorXML>
    </EFileActivityXML>
    <EFileActivityXML SeqNum="2">
      <BSAID>31000055053785</BSAID>
      <EFileActivityErrorXML SeqNum="1"/>
    </EFileActivityXML>
    <EFileActivityXML SeqNum="3">
      <BSAID>31000055053786</BSAID>
      <EFileActivityErrorXML SeqNum="1"/>
    </EFileActivityXML>
  </EFileSubmissionXML>
</EFileBatchXML>
```

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On this slide we provide a sample DOEP acknowledgement XML file. The 8300 acknowledgement file will be in the same format but with error codes pertaining to the Form 8300. Here we have 3 FinCEN DOEP activities where each is assigned a unique BSA ID. The SeqNum value for each EFileActivityXML matches the Activity SeqNum value from the input batch submission. Then, under each EFileActivityXML element we have the BSAID element and the EFileActivityErrorXML element. If there are no errors associated with the Activity, then the EFileActivityErrorXML will be closed with no sub-elements, as shown further down in the example. However, when errors are associated with the Activity, this element will be recorded for each error, and include the sub-elements displayed to provide details regarding the error. The ErrorContextText element provides the path to the exact location in the input batch file where this error was triggered. For example, the first error (P02) was triggered at the RawIndividualFirstName whose parent element is the PartyName element with SeqNum="30". If you search in the original batch file for SeqNum="30", you will be taken directly to the location where this error occurred. This is the way FinCEN maps the errors batch to the original batch submission, and is why the SeqNum values in the batch must be unique.



## XML Server-to-Server Filing: Overview

### Secure Data Transfer Mode (SDTM)

- Secure, server-to-server mechanism for transmitting batch files
- Existing SDTM connections may be reused
- Must be a single file containing the XML batch data:
  - **Submission type:** DOEPXST, 8300XST
  - **Date/Time:** This will be a date-time stamp to guarantee filename uniqueness
    - Year = YYYY
    - Month = MM
    - Day = DD
    - Hour = hh
    - Minute = mm
    - Second = ss
  - **Organization name:** Custom naming by the submitting organization (e.g. "ABCPreparingFirm")
  - **Extension:** xml
  - **Example XML batch file name:** DOEPXST.20190609153015.ABCPreparingFirm.xml
  - **Corresponding XML batch Acknowledgement file name:** This file name will match the corresponding input XML batch file name with the text "\*.ACKED" appended to the end. For example:  
DOEPXST.20190609153015.ABCPreparingFirm.xml.ACKED

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As mentioned earlier in this deck, filers have the option to transmit their XML batch files directly to the FinCEN server without having to utilize the web interface. Secure Data Transfer Mode (also known as SDTM) allows for a secure, system to system mechanism for transferring batch submissions from your organization's internal server to the BSA E-Filing server. If you already have an SDTM account and tunnel to FinCEN, you may continue to utilize this method of submission for these new form types, but must follow the naming conventions displayed here as well as in the User Guide. If you are interested in this method of filing, please reach out to the help desk for additional information.



## Questions & Answers

At this time, we invite you to use your webinar text interface to submit any questions. We will pause for a few minutes and respond to as many questions as we can.

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(No notes for this slide)